

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

MICHAEL BOISSONNEAU

Plaintiff,

v.

DAVID TIBBS, et al.,

Defendants.

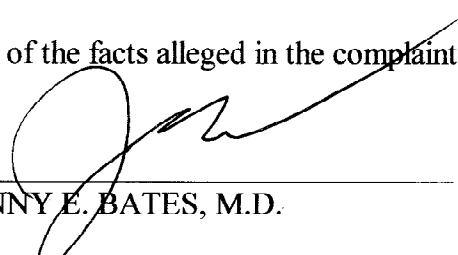
CASE NO.-2:07-CV-914-MHT-TFM

AFFIDAVIT

Before me, the undersigned authority, personally appeared Johnny E. Bates, M.D., who, after first being duly sworn, says as follows:

“My name is Johnny E. Bates, M.D. I am the President of Quality Corrections Health Care, Inc. My company provides medical care to inmates at the Montgomery County Detention Facility pursuant to a contract with Montgomery County. The effective date of such contract was April 1, 2007. That was the first time my company provided any medical services at the Montgomery County Detention Facility.

The Plaintiff states that the date of the alleged violation was January 28, 2007. Therefore, neither I nor any person employed by my company has ever had any contact with the Plaintiff. I have no medical records on the Plaintiff and have no knowledge of the facts alleged in the complaint.

  
JOHNNY E. BATES, M.D.

SWORN TO and SUBSCRIBED before me this 20 day of November, 2007.

  
NOTARY PUBLIC

My Commission Expires: 2/23/2008